Case 3:12-cv-00073-MEJ Document 9 Filed 04/02/12 Page 1 of 3

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9				
10	UNITED STATES DISTRICT COURT			
11	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
12	MARION ZIMMER BRADLEY) Case No.: 3:12-CV-00073 MEJ		
13	LITERARY WORKS TRUST,)) 		
14	and) STIPULATION AND [PROPOSED]) ORDER TO EXTEND ALL		
15	ANN SHARP, Trustee,) DEADLINES BY 21 DAYS		
16	Plaintiffs, v.))		
17	MARY BATTLE, and DOE 1,			
18	MAKT DATTLE, and DOE 1,))		
19	Defendants.			
20		,		
21	Pursuant to Civil Local Rule 6-2, Plaintiffs Marion Zimmer Bradley Literary Works Trust			
22	and Ann Sharp, Trustee, and Defendant Mary Battle hereby jointly move the Court to extend all			
23	current deadlines in the case by 21 days to provide more time for independent settlement			
24	negotiations. Since the filing of the case, Ms. Battle has retained counsel and the parties have			
25	exchanged documents and discussed settlement terms, and resolution appears reasonably likely.			
26	Thus, the parties jointly request the following adjustments to the current pre-trial schedule:			
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Case 3:12-cv-00073-MEJ Document 9 Filed 04/02/12 Page 2 of 3

1	Event	Original Deadline	New Deadline	
1	Meet and confer re: initial			
2	disclosures, early settlement,	3/22/2012	4/12/2012	
2	ADR process selection, and	3/22/2012	,, , =, = 0 , 1 =	
3	discovery plan			
4	File ADR Certification signed by Parties and Counsel	3/22/2012	4/12/2012	
	File either Stipulation to ADR			
5	Process or Notice of Need for	3/22/2012	4/12/2012	
6	ADR Phone Conference	57 -2 7-2012	., 12, 2 0 12	
_	File Rule 26(f) Report,			
7	complete initial disclosures or			
8	state objection to in Rule 26(f)	4/5/2012	4/26/2012	
	Report and file Case			
9	Management Statement File Defendant's Answer to			
10	Complaint	4/6/2012	4/27/2012	
	Initial Case Management		7/2/2012	
11	Conference	4/12/2012	5/3/2012	
12		·		
13	RESPECTFULLY SUBMITTED			
14	Dated: March 30, 2011			
15		By <u>/s/ Kelley A. Way</u> Kelley A. Way		
16	Attorney for Plaintiffs			
			Literary Works Trust and	
17		Ann Sharp, Trustee	-	

Dated: March 30, 2011

By /s/ David R. Owens

David R. Owens

Attorney for Defendant Mary Battle

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1 [PROPOSED] ORDER 2 Pursuant to the joint stipulation of the parties, and good cause appearing, the Order Setting 3 Initial Case Management Conference and ADR Deadlines (Dkt. No. 2) is herby modified as follows: 4 5 4/12/2012 Last day to: • meet and confer re: initial disclosures, early settlement, ADR process 6 selection, and discovery plan file ADR Certification signed by Parties and Counsel 7 file either Stipulation to ADR Process or Notice of Need for ADR Phone 8 Conference 9 4/26/2012 Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement 10 11 5/03/2012 INITIAL CASE MANAGEMENT CONFERENCE in Ctrm. B, 15th Floor, SF at 10:00 AM 12 13 IT IS SO ORDERED. 14 DATED: April 2, 2012 15 16 TATES MAGISTRATE JUDGE 17 1220688.1 18 19 20 21 22 23 24 25 26 27 28